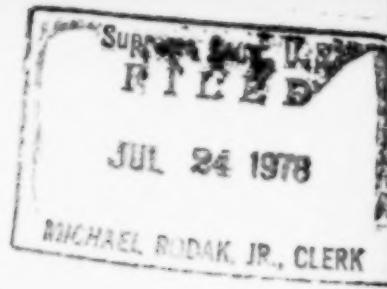


77-1601



Supreme Court
of the
United States

CAMILLE MILLER PERRY
and
EUGENIA SUMMERLIN,
Petitioners

vs

IRENE WILSON, CECILA BUCHANAN
and
JOSEPHINE MATTOX,
Respondents

vs

C. L. HIGGISON,
Respondent

REPLY BRIEF

NO. 77-1601

ATTORNEY FOR PETITIONERS
Randall M. Clark
P.O. Box 384
Brunswick, Georgia 31520
912-264-6661

REPLY BRIEF

Pursuant to directions of the clerk of this court in his letter of June 23, 1978, petitioner files his reply brief.

The United States Supreme Court is not bound by a state court determination of waiver. *Street v New York* 394U.S. 576, 583.

This court clearly has jurisdiction to determine that waiver did not occur. *Truax v Corrigan* 257U.S. 312; *Parker v Illinois* 333U.S. 571; and *Union P.R. Co. v Public Service Co.* 248U.S. 67.

Since the attorney representing petitioners at trial objected to a discrimination based on legitimacy or illegitimacy of a child waiver did not occur.

Respectfully submitted this 21 day of July, 1978.

1/s/ Randall M. Clark
Randall M. Clark

P.O. Box 384
1708 Ellis Street
Brunswick, Georgia 31520

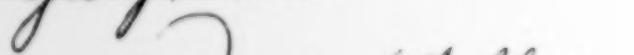
CERTIFICATE OF SERVICE

Service by mailing three copies each to:

Attorney for C.L. Higgison
Robert Killian
Post Office Box 1795
Brunswick, Georgia 31520

Attorney for Celia Wilson Buchanan,
William Major
310 Fulton Federal Building
Atlanta, Georgia 30303

This 21 day of July, 1978.


Randall M. Clark

P.O. Box 384
1708 Ellis Street
Brunswick, Georgia 31520